CONFIDENTIAL

Analog data to address EPA's ecotoxicity concerns for P-17-0119

Introduction:
In order to address EPA's concerns for the aquatic toxicity of P-17-0119, we are providing the
following test data conducted on a close analog of the PMN substance:

- 1) Acute Toxicity to Daphnia magna
- 2) Algal growth inhibition assay

Representative Chemic	cal Structure o	f the analog:

Monomers and reactants used to manufacture the analog polymer:

CAS RN and CAS Name - CAS RN:

Synonyms:

CONFIDENTIAL

GPC Data:

Mn: 11,122 D

Wt. % < 1000:1.31 % Wt. % < 500: 0.00%

Summary of Aquatic Toxicity Tests:

Study Title	Result
Acute Toxicity to Daphnia magna	48 hour EC ₅₀ value: >10g/L
Algal growth inhibition study	E _b L ₅₀ (72 h): >10g/L



ClientService

A division of the American Chemical Society

Phone: 800-631-1884, 614-447

Fax: 614-447 E-mail: answers@c

Internet: http://www.cas.org/Support/clien

CAS CLIENT SERVICES

Order Number

Customer's Substance ID

Processing Result

Comments

-						
.a						

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n olas karanan kelengan dan mengganagan, pengangkan agalakan agalakan kelengan kelengan kelengan kelengan kele Pengan

タイトル:

<表題部>

Sample Name サンプル名 201003. mdb データベース名 保存データ名 : 201003100001

メソット・データ名 収集属性 計算Ch

: 201003100001 独立

: Ch 1

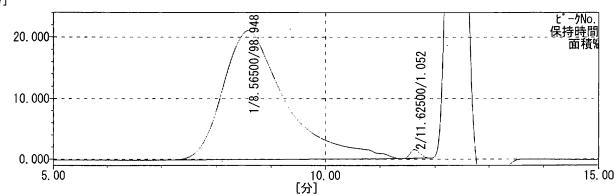
測定日時 計算日時 : 2009/09/29 15:44:30 : 2010/03/23 14:47:47

: 10 シリアル番号 カップ番号 : 2

収集時間[分]: 5.00 - 15.00 計算方法

: 分子量計算

[mV]



<Ch1 分子量計算結果>

t°-ク 1 ペ-スピ-ク [分]

t゚-クスタート:

		-	
ピークス <i>タ</i> ート:	7. 11	-0. 130	419, 537
ピークトップ゜:	8, 56	21.076	49,816
ピークエント゚:	11.35	0. 114	582

[mV]

0.130

[MOL]

[MOL]

549

497

465

面積[mV·秒] 1, 684, 058 93.571 高さ比[%] 高さ[mV] 21.122 $[\eta]$ 49, 378, 56167

ピーク 2 ペースピーク [分] [mV]

ヒークトッフ・・ 11.63 1.612 11.88 0.202 17.902 面積[mV·秒] 高さ比[%] 6.429 1.451

11.44

高さ[mV] $[\eta]$ 495. 45749 1.1.

Mn	:	11, 122
Mw	:	49, 379
Mz	:	91, 386
Mz+1	:	129, 456
Mv	:	49, 379
Mp	:	51, 206
Mz/Mw	:	1, 851
Mw/Mn	:	4, 440
Mz+1/Mw	:	2, 622

495 Mn 495 Mw 496 Μz Mz+1496 Mν 495 490 Mp Mz/Mw 1.001 Mw/Mn 1.001 Mz+1/Mw : 1.002

<分析条件> 〈	GPC	Amaly sis	condition >
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. ``	371-25-11-7	•
Column	カラム	: TSKgel SuperHZM-M X2
Lot, vo. Flow nate	カラムロットNo	: K0022、K0023
-Flow nate	流量	: 0.35 ml/min
Operator	測定者	
Detector	検出器	: IVI — 022V
Content	濃度	: 6 mg/ml
Injection	注入量	: 3 µ 1
Column Temp.	カラム温度	: 40 °C
Pilute	溶離液	: THE

					-		
<デ・-タ>	ハラ目	÷n ★ [N]	壬 7.	/+ - · h €2		式係数 - 2 F04010F 000	
時間[分] Retention Time	分子量 —Melecular	誤差[%] 	重み 	作成データ名	A= B=	3. 504818E-002 -9. 607648E-001	
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8, 23	87000	-4. 00228	1		D=	-1. 490732E+001	
8. 59	50000	4. 84774	1				
8. 87	28000	-0. 52567	1				
8. 93	25000	-0. 44226	1				
9. 26	13000	−2. 7165 5	1				
9. 41	10200	1. 64717					
10. 61	1300	0. 02484	1		相関係数	汝: −1.000	
	1					4ř	
	Polystyle	en standard s	ampl.	e			

7.41

305, 156

1.4344

1.5096

1.6252

1.8217

1. 9355

2.0756

2.0666

2.0980

2.1158

2. 1202

2.2176

2. 3938

2.5821

2.7298

2. 8765 2. 9438

2.9326

3.0254

3. 1177

3, 2481

3.4292

3.6477

3.8138 3.9788

4. 1048

4. 1541

4.2157

4. 3147

4.5137

4.7743

4.9709

5, 1539

5.3484

5.6037

5, 6971

5.8146 5.9316

6. 2193

6.4689

6.7171

6.9033

7.1249

7. 3937

7. 5647 7. 6869

7.9282

8.2400

8.4907

8.7877

9.0595

9.3654

9, 6581

9.8787

10.0632

10. 3755 10. 7213

11.0423

11.3850

11.7144

12.0309

12. 3458

12.6709

12.9945

13. 3167

13.6716

14.0251

14, 4338

14.8067

15. 1554

15. 5139

381, 2065

401. 1926

431.9257

484. 1394

514. 3863

551.6126

549. 2348

557. 5764

562. 3137

563, 4828

589. 3641

636, 1958

686. 2363

725. 4706

764. 4595

782. 3629

779. 3827

804, 0446

828.5594

863, 2205

911. 3543

969. 4280

1013. 5597

1057. 4324

1090, 9145

1103, 9964

1120, 3685

1146, 6983

1199, 5899

1268. 8249

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1369. 7222

1421. 4028

1489. 2519

1514, 0760

1545. 3168

1576, 3958

1652. 8626

1719, 1863

1785. 1591

1834, 6529

1893. 5462

1964. 9730

2010. 4288

2042. 8915

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2256. 5214

2335, 4450

2407.6783

2488. 9847

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2674, 4226

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2849, 3426

2934.6360

3025. 7053

3113. 2718

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99.8899

99, 8839

99, 8775

99.8705

99. 8631

99.8553

99. 8473 99. 8393

99. 8310

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99.8134

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99.6047

99, 5875 99, 5694

99, 5505

99.5309

99.5106

99. 4897

99.4678

99. 4455

99, 4227

99, 3991

99.3745

99, 3491

99. 3228

99. 2955 99. 2673

99, 2381

99. 2082

99, 1776

99, 1461

99, 1133

99.0796

99. 0446 99. 0086

98.9715

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7 21	380, 777	0. 1311	34 8320	99. 9983 99. 9981		7. 56	252. 803
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- - 4 1 - 7 4 . 201002 mdb

C:¥データ2010¥201003.mdb 201003100001

Tuesday, Mar 23 2010

C:¥データ2010¥201003.mdb 201003100001

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7. 2810

10, 91

891

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11.26

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11. 34	587	0. 3602	95. 7177	0. 0002	
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11. 46 11. 46	543 541	66. 0856 85. 8950	2717. 3613 3531. 8976	99. 8299 99. 7160	
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11.48	536	173. 5905	7137. 8345	99. 1512	
11. 48 11. 49	534 533	208. 3278 238. 4445	8566, 1869 9804, 5528	98. 8853 98. 5838	
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11.50	528	408. 9334	16814. 8509	97. 2718	
11.51 11.51	527 525	480. 9746 548. 9429	19777. 0978 22571. 8695	96. 6875 96. 0275	
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11. 52	523	706. 3207	29043. 0555	94. 4602	
11. 53 11. 53	521 520	787. 5692 882. 2403	32383, 8959 36276, 6601	93. 5428 92. 5262	
11.54	518	981. 9622	40377, 1053	91. 4071	
11.54	517	1080, 9637	44447. 9272	90. 1888	
11. 55	516	1176. 2198	48364. 7447	88. 8780	
11, 55 11, 56	514 513	1298, 0289 1413, 4739	53373, 3870 58120, 3462	87. 4479 85. 9086	
11. 56	512	1519, 2242	62468, 6710	84. 2734	
11.57	511	1630. 6958	67052. 2476	82. 5390	
11.57	509	1751. 2947	72011. 1314	80. 6988	
11. 58 11. 58	508 507	1861, 9941 1955, 8931	76562, 9573 80423, 9719	78. 7660 76. 7609	
11. 59	506	2055. 5358	84521, 1571	74. 6800	
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11. 60 11. 60	503 502	2242. 4070 2325. 8795	92205. 0769 95637. 3661	70. 3112 68. 0468	
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11, 62	499	2569. 0762	105637, 3229	60. 9732	
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11. 63	496	2706. 9188	111305, 2454	53. 6907	
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11.64	494	2743, 1629	112795. 5591	48. 8939	
11. 65 11. 65	493 492	2752. 4579 2754. 1765	113177. 7581 113248. 4216	46, 5377 44, 2164	
11.66	491	2743. 9172	112826, 5744	41. 9400	
11.66	490	2753. 9411	113238, 7426	39. 6918	
11.67	489	2760. 2128	113496, 6269	37. 4751	
11. 67	488	2711. 6204	111498. 5670	35. 3335	

GPC-8020 REPORT GPC-8020 REPORT

2674, 4028 109968, 2234 33, 2570 11.68 31. 2555 11.68 486 2622.8001 107846. 3853 486 2569. 4495 29. 3291 11.69 105652.6719 11.69 485 2523. 3534 103757. 2546 27. 4711 484 101413.9626 25.6882 11.70 2466.3650 11.70 483 482 2430. 9294 99956, 8904 23, 9636 11.71 2384.5821 98051, 1447 22.3041 20. 6995 482 11. 71 2351, 2267 96679.6115 19. 1633 11.72 481 2296. 5728 94432. 3084 11. 72 480 2224. 4081 91464, 9849 17.7056 16. 3397 11, 73 479 2128. 3911 87516, 8789 479 2065. 6546 84937. 2327 15.0422 11. 73 11.74 478 1967, 4984 80901, 1664 13, 8332 11, 74 477 1920. 7494 78978, 9032 12.6792 11, 75 477 1854, 7824 76266, 4199 11, 5902 476 1826. 6614 75110.1184 10.5428 11.75 11.76 475 1797, 2460 73900, 5926 9.5369 475 1748.0151 71876, 2778 8.5827 11.76 11.77 474 1633, 3302 67160, 5717 7, 7137 11.77 474 1532.0156 62994. 6383 6.9197 11, 78 473 1465.0887 60242, 6851 6. 1807 472 11.78 1401. 2893 57619.3287 5. 4933 11. 79 472 1298, 6886 53400, 5103 4.8743 4. 2902 11, 79 471 1262. 4252 51909, 4031 471 1253. 8577 3.7276 11.80 51557, 1176 470 1267. 9428 3.1764 11.80 52136. 2839 11.81 470 1195.4197 49154. 2193 2. 6734 11,81 470 1052.0460 43258, 8665 2. 2455 1. 8726 11.82 469 949.6980 39050, 4391 469 11.82 839, 8046 34531.7525 1.5547 468 758. 2531 31178. 4547 1.2784 11.83 11.83 468 660, 6122 27163, 5779 1,0470 468 654.5108 26912.6958 0.8270 11.84 467 11.84 647.9253 26641.9084 0.6184 467 629.8951 0.4246 11.85 25900. 5295 467 466 11.85 564, 4896 23211, 1347 0.2589 432, 4333 17781, 1364 0.1382 11, 86 466 11.86 324. 1333 13327. 9718 0.0523 466 5617, 4510 0.0181 11.87 136. 6152 465 465 11, 87 11, 4785 471, 9808 0.0154 69.4303 2854. 8895 0.0000 11.88 11.88 465 0.0000 0.0000 0.0000 Tuesday, Mar 23 2010

C:¥データ2010¥201003.mdb 201003100001



ACUTE TOXICITY TO DAPHNIA MAGNA

HLS study number:

Version ID:

Final

Issue date:

19 August 2008

Sponsor and Test Facility Details

Sponsor

Test Facility

Huntingdon Life Sciences Eye Research Centre

Eye Suffolk **IP23 7PX** UK

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Compliance with Good Laboratory Practice

Acute Toxicity to Daphnia magna

The study described in this report was conducted in compliance with the following Good Laboratory Practice standards and I consider the data generated to be valid.

The UK Good Laboratory Practice Regulations (Statutory Instrument 1999 No. 3106, as amended by Statutory Instrument 2004 No. 994).

OECD Principles of Good Laboratory Practice (as revised in 1997), ENV/MC/CHEM (98) 17.

EC Commission Directive 2004/10/EC of 11 February 2004 (Official Journal No L 50/44).

These principles of Good Laboratory Practice are accepted by the Regulatory Authorities of the United States of America and Japan on the basis of Intergovernmental Agreements.

Jennifer J Wilby BSc MIBiol

Study Director

Huntingdon Life Sciences Ltd

Quality Assurance Statement

Acute Toxicity to Daphnia magna

The following inspections and audits have been carried out in relation to this study:

Study Phase	Date(s) of Inspection	Date of Reporting to Study Director and Management
Protocol Audit	17 March 2008	17 March 2008
Report Audit	24 June 2008	24 June 2008

Process based inspections: At or about the time this study was in progress inspections of procedures employed on this type of study were carried out. These were conducted and reported to appropriate Company Management as indicated below:

Process Based Inspections	Date(s) of Inspection	Date of Reporting to Management
Dose Formulation	3 June 2008	3 June 2008
Experimental Set-up	10 April 2008	10 April 2008
Observations	11April 2008	11April 2008
Sampling of Test Media for Chemical Analysis	3 June 2008	3 June 2008
Carbon Analysis	27 February 2008	27 February 2008

In addition, an inspection of the facility where this study was conducted was carried out on an annual basis. These inspections were promptly reported to Company Management.

Sarah J Watts CBiol MIBiol MRQA

Principal Auditor

Department of Quality Assurance

Huntingdon Life Sciences Ltd.

19 AUGUST 2008

Date

Contributing Scientists

Acute Toxicity to Daphnia magna

Study management

Jennifer J Wilby BSc MIBiol Study Director (replacement) Aquatic Ecotoxicology and Biodegradation

Kim Utting Cert NatSci (Open) Study Director (original) Aquatic Ecotoxicology and Biodegradation

Jonathan Burke BSc MRes Study Manager Aquatic Ecotoxicology and Biodegradation

Robert A Dickinson BSc Study Manager Aquatic Ecotoxicology and Biodegradation (Carbon Analysis)

Georgina L Podd Laboratory Technician Aquatic Ecotoxicology and Biodegradation (Carbon Analysis)

Summary

The acute toxicity of (tested as a WAF; water accommodated fraction) to Daphnia magna was assessed under static exposure conditions.

The study was conducted in accordance with EC Methods for Determination of Ecotoxicity, Annex to Directive 92/69/EEC (O.J. No. L383A, 29.12.92) Part C, Method 2 "Acute toxicity to *Daphnia*" and the OECD Guideline for Testing of Chemicals No. 202, "*Daphnia* Acute Immobilisation Test" (2004).

Groups of twenty *Daphnia*, less than 24 hours old, were exposed for 48 hours to a WAF prepared from an aqueous mixture with an initial nominal concentration of 10 g/l. The test media was prepared in Elendt M4 medium by the direct addition of the test substance to the dilution medium. To aid dissolution, the test mixture was stirred overnight in the dark before being left to stand for approximately 3 hours. The aqueous phase (WAF, approximately 700 ml) was then removed and used as the test medium.

The composition of the test substance made it unsuitable for analysis using chromatographic methods. Consequently, the exposure level was monitored using Total and Dissolved Organic Carbon (TOC and DOC). At the start of the test, the mean measured levels of TOC and DOC in samples of the control and test medium were 1.15 and 0.1 mg C/l respectively. After 48 hours, the mean measured levels of TOC in samples of the control and test medium were 1.20 and 0.2 mg C/l respectively and levels of DOC were 1.20 and 0 mg C/l. Results of a water extractivity test conducted using a pH 7 buffered solution of at a loading rate of 10 g/l indicated a carbon content of 0.18 mg C/l. The results achieved in the test confirm the low solubility of the test substance.

Observations of the *Daphnia* in each control and test vessel were made after approximately 24 and 48 hours. No immobilisation or adverse effects on the *Daphnia* were observed.

Based on these findings the following values have been estimated:

48-hour EC₅₀ value : $>10 \text{ g/l}^*$ "No observed effect concentration": 10 g/l^*

^{*:} nominal concentration of the initial aqueous mixture used to prepare the WAF.

1. Introduction

The objective of the study was to determine the acute toxicity (48 hour median effect concentration - EC₅₀) of to Daphnia magna.

The study was conducted in accordance with EC Methods for Determination of Ecotoxicity, Annex to Directive 92/69/EEC (O.J. No. L383A, 29.12.92) Part C, Method 2 "Acute toxicity to Daphnia" and the OECD Guideline for Testing of Chemicals No. 202, "Daphnia Acute Immobilisation Test" (2004). The design of the study was in accordance with recommendations received from the UK Environment Agency (May 2007), which proposed the use of a WAF.

The protocol was approved by Huntingdon Life Sciences Management and the Study Director on 7 March 2008 and by the Sponsor on 23 January 2008.

The experimental start and completion dates of the study were 17 March and 26 March 2008, respectively.

The study was conducted at Huntingdon Life Sciences Ltd, Eye Research Centre, Eye, Suffolk, IP23 7PX, England.

The composition of the test material made it unsuitable for analysis using chromatographic methods. Consequently, Total and Dissolved Organic Carbon analysis was undertaken on samples of media taken at the start and end of the test.

Information provided by the Sponsor indicated that was insoluble in water. Results of a water extractivity test conducted using a pH 7 buffered solution of at a loading rate of 10 g/l indicated a carbon content of 0.18 mg C/l.

In accordance with the recommendation of the OECD Guidance Document on Aquatic Toxicity Testing of Difficult Substances and Mixtures (Number 23), the test results have been expressed in terms of the nominal loading rate (i.e. the nominal weight of the test substance used to prepare the aqueous mixture from which the WAF (water accommodated fraction) was removed).

2. Test substance

Identity:	
Chemical name:	
Lot number:	
Expiry Date:	12 December 2008
Appearance:	White powder
Storage conditions:	Room temperature in the dark, desiccated
Purity/assay:	99.55%
Water solubility:	Insoluble
Sample received (Huntingdon Site):	10 January 2008

The Sponsor's Certificate of analysis is given in Appendix 1

3. Experimental procedure

3.1 Test Organism

Daphnia magna (Straus) used in this study were cultured in-house and were obtained from a strain originating from the National Institute for Applied Chemical Research (IRCHA), France.

Stock cultures of Daphnia magna were maintained in glass vessels containing approximately 0.5 to 0.8 litres of Elendt M4 culture medium in a temperature-controlled laboratory at nominally 20 ± 2 °C. A photoperiod of 16 hours light: 8 hours dark was maintained, with periods of subdued lighting at the beginning and end of each light phase. The culture medium was renewed three times each week.

Cultures were fed daily with a suspension of the unicellular green algae, *Pseudokirchneriella* subcapitata, to provide nominally 0.1 to 0.2 mg carbon per daphnid, per day, except during the initial three days when a slightly lower ration was given. Culture conditions ensure that the stock animals reproduce by parthenogenesis.

The day before the start of the study, all juvenile *Daphnia* were removed from the laboratory cultures. The following morning, juveniles produced by the gravid (egg-bearing) adult *Daphnia* were removed from the culture vessels and held in a separate holding vessel; these animals, which were less than 24 hours old, were used in the test.

3.2 Dilution Medium

The test organisms were maintained and the tests conducted in Elendt M4 medium (Appendix 2). The medium was prepared in deionised, reverse osmosis water.

3.3 Test substance preparation

The method of preparation used during the test was based on recommendations by the UK Environment Agency Chemicals Assessment Unit (May 2007).

The test substance (10 g) was dispersed in culture medium (1 l) in a glass vessel. This aqueous mixture was stirred overnight in the dark before being left to stand for approximately 3 hours. An aliquot (700 ml) of the aqueous phase (WAF) was then removed from mid position from the preparation vessel and was used as the test medium.

3.4 Exposure Conditions

The study comprised a single definitive (limit) test.

3.4.1 Experimental design

Twenty *Daphnia*, four replicates of five animals per vessel, were exposed in each control and test group.

The first instar *Daphnia* were placed in groups of five, at random into glass dishes containing 100 ml of medium to give a loading of 20 ml medium per organism. The dishes were loosely covered.

3.4.2 Test concentrations

The test employed a nominal loading rate of 10 g/l. This concentration was based on the nominal weight of test substance used to prepare the aqueous mixture from which the WAF (water accommodated fraction) was prepared.

3.4.3 Medium renewal

Daphnia were exposed to the test or control conditions for a period of 48 hours without renewal of test media.

3.4.4 Stability of test concentrations

Total and Dissolved Organic Carbon (TOC and DOC) analysis (Appendix 3) was undertaken on samples of media taken at the start and end of the test.

At the start of the test, four samples (50 ml) were taken from the freshly-prepared control and test media; after 48 hours, the contents of the replicate vessels for each group were pooled and eight further samples were taken for analysis. All samples were stored in a freezer until defrosted for analysis when required.

Two samples for each sampling point were analysed for Total Organic Carbon and two were filtered (0.45µm cellulose nitrate) before analysis for Dissolved Organic Carbon.

3.4.5 Environmental conditions

The temperature of the test area was maintained at $20 \pm 2^{\circ}$ C during the test. Temperature was continuously monitored in an additional vessel containing the same volume of dilution medium. A photoperiod of 16 hours light: 8 hours dark was maintained, with periods of subdued lighting at the beginning and end of each light phase. No supplementary aeration was employed and no feed was given during the exposure period.

The temperature, pH and dissolved oxygen levels of control and test media were recorded at the start and at the end of the study. The total hardness and alkalinity of the dilution medium was measured before use.

3.5 Criterion of effect

Daphnia were considered to be immobile if they were unable to swim within approximately 15 seconds following gentle agitation of the test vessel.

The numbers of mobile, immobile and floating *Daphnia* were counted approximately 24 and 48 hours after the start of the study.

3.6 Evaluation of data

The "no observed effect concentration" (NOEC) was derived by direct inspection of the data on the immobility of the animals. An incidence rate of more than 10% is considered to be significant.

3.7 Protocol Deviations

None.

4. Maintenance of records

All specimens (if appropriate), raw data and study related documents generated during the course of the study at Huntingdon Life Sciences, together with a copy of the final report will be lodged in the Huntingdon Life Sciences Archive.

Specimens and records will be retained for a minimum period of one year from the date of issue of the final report. At the end of the one year retention period the Sponsor will be contacted and advice sought on their future requirements. Under no circumstances will any item be discarded without the Sponsor's knowledge.

Huntingdon Life Sciences will retain the Quality Assurance records relevant to this study and a copy of the final report in its archive indefinitely.

5. Results

5.1 Chemical analysis

The results of carbon analysis are given in Table 1.

At the start of the test, the mean measured (blank corrected) TOC and DOC levels in samples of the control and test media were 1.15 and 0.1 mg C/l respectively.

After 48 hours, the mean measured (blank corrected) levels of TOC in samples of the control and test media were 1.20 and 0.2 mg C/l respectively; the DOC levels were 1.20 and 0 mg C/l.

In accordance with the recommendation of the OECD Guidance Document on Aquatic Toxicity Testing of Difficult Substances and Mixtures (Number 23), the test results have been expressed in terms of the nominal loading rate (i.e. the nominal weight of the test substance used to prepare the aqueous mixture from which the WAF (water accommodated fraction) was removed).

5.2 Immobility

Observations of the *Daphnia* in each control and test vessel made after 24 and 48 hours. No immobilisation or adverse effects on the *Daphnia* were noted.

Based on these findings the following values have been estimated:

48-hour EC₅₀ value : >10 g/l*
"No observed effect concentration": 10 g/l*

5.3 Environmental parameters

The measurements of water quality (temperature, pH, dissolved oxygen, total hardness and alkalinity) are summarised in Table 3; they remained within acceptable limits during the study.

The test medium was a non-homogeneous, hazy dispersion.

^{*:} nominal concentration of the initial aqueous mixture used to prepare the WAF.

6. Conclusions

Under the conditions of the study, a WAF of the was not found to be acutely toxic to Daphnia magna at a nominal loading rate of 10 g/l.

Consequently, the 48-hour EC₅₀ value for with *Daphnia magna* could not be calculated but must be >10 g/l and the "no observed effect concentration" was 10 g/l.

7. References

UK ENVIRONMENT AGENCY CHEMICALS ASSESSMENT UNIT RECOMMENDATIONS (2007). Notification of New Substances Regs. (1993): Level 1B Testing Proposal

OECD Guidance Document on Aquatic Toxicity Testing of Difficult Substances and Mixtures (Number 23) ENV/JM/MONO(2000)6

Table 1 Measured TOC and DOC concentrations

Nominal	Measured TOC concentrations (mg C/l)			
Loading Rate (g/l)	0 h	ours	48 1	hours
Control	0.9	1.4	1.2	1.2
Control	(1.	15)	(1	.20)
10*	0.05	0.15	0.0	0.4
	(0	.1)	(0	0.2)

blank corrected values (measured concentration - mean control value for sampling occasion)
 mean measured concentration

Nominal Loading Date	Measured DOC concentrations (mg C/l)			
Loading Rate (g/l)	0 hours		48 hours	
Control	1.1	1.2	1.2	1.2
	(1.	15)	(1.	20)
10*	0.15	0.05	0.0	0.0
10	(0	.1)	(0	.0)

blank corrected values (measured concentration - mean control value for sampling occasion)
mean measured concentration

Table 2 Environmental parameters

Nominal Loading Rate	Temperature (°C)				Dissolved oxygen (%ASV)	
(g/l)	0 h	48 h	0 h	48 h	0 h	48 h
Control	19.1	20.1	7.42	7.49	90	89
10	19.6	20.0	7.55	7.53	92	90

ASV : air saturation value.

The total hardness of the batches of Elendt M4 medium used in the study were 240 and 248 mg CaCO₃. The measured alkalinity was 50.1 mg/l as CaCO₃.

Continuous monitoring of an additional vessel containing dilution medium = 19.0 to 20.2°C.

Appendix 1 Certificate of Analysis

CERTIFICATE OF ANALYSIS

NAME OF SAMPLE :

DATE OF ANALYSIS : 12 December 2008

COMPOSITION

Identity	Cas No.	Conc.
£1		7
 #2	•	1
		
#3		
<u></u>	1	0,
i. T		
v.#		
#5		1,000
TOTAL		100%

NAME :		
<u>SIGNATL</u>	DATE 23 June 20	08

Appendix 2 Elendt M4 Medium

1.	Micro elements	mg/l
	H_3BO_3	2.86
	MnCl ₂ .4H ₂ O	0.36
	LiCl	0.31
	RbCl	0.071
	SrCl ₂ .6H ₂ O	0.152
	NaBr	0.016
	$Na_2MoO_4.2H_2O$	0.063
	CuCl ₂ .2H ₂ O	0.017
	$ZnCl_2$	0.013
	CoCl ₂ .6H ₂ O	0.010
	KI	0.0033
	Na ₂ .SeO ₃	0.0022
	NH ₄ VO ₃	0.00058
	Fe-EDTA solution	3.50
2.	Macro nutrients	mg/l
	CaCl ₂ .2H ₂ O	294
	MgSO ₄ .7H ₂ O	123
	KCl	5.80
	NaHCO ₃	64.8
3.	Buffer nutrients	mg/l
	Na ₂ .SiO ₃ .9H ₂ O	10
	NaNO ₃	0.274
	KH_2PO_4	0.143
	K_2HPO_4	0.184
4.	Vitamins	mg/l
	Thiamine hydrochloride	0.075
	Cyanocobalamine (B12)	0.0010
	Biotin	0.00075

The above analytical grade reagents are dissolved in deionised water produced by reverse osmosis.

Appendix 3 Total and Dissolved Organic Carbon Analysis (TOC and DOC)

Introduction

TOC or DOC concentrations in aqueous mixtures were determined using an OI Model 700 carbon analyser. Samples for DOC analysis were prepared by filtration of the medium (0.45 µm membrane filters).

Organic carbon concentrations were measured in this analysis by the amount of carbon dioxide released by chemical oxidation of the aqueous sample at 100°C in the presence of phosphoric acid and sodium persulphate. The carbon dioxide was purged from the sample, concentrated by trapping and desorbed and carried to a non-dispersive infrared detector (NDIR) whose output was calibrated (using aqueous solutions of potassium hydrogen phthalate) to directly display the concentration of carbon present in the sample. Sample volumes were measured using a calibrated sample loop (1.02 ml) and phosphoric acid then sodium persulphate were automatically injected with each sample.

Materials

Chemicals used in carbon analysis

Potassium hydrogen phthalate (Analar grade) used as a standard.

Sodium persulphate (98+%).

Phosphoric acid (85% Orthophosphoric acid, analytical grade; SG 1.7) for acidification of samples as part of the analysis in "TIC/TOC" mode.

Dilution water

The dilution water used to prepare solutions was tap water that had been softened and treated by reverse osmosis then purified; resistivity ≥ 18 M Ω .cm. This water complied with the relevant British Standard and American Society for Testing and Materials for classification as Grade 1 or Type 1 Laboratory Water, respectively.

Determination of carbon levels

The carbon analyser was calibrated using at least five samples of an aqueous solution of potassium hydrogen phthalate (20 mg C/l). At least five samples of ultrapure water verified the absence of contamination within the carbon analyser and the TOC content of five samples of the reagents (sodium persulphate and phosphoric acid) were analysed to obtain a mean blank value in the calibration. These reagent blanks were entered into the calculation program of the analyser. The potassium hydrogen phthalate solution was analysed at the end of each set of analyses and verified the stability of the detector response.

The TOC/DOC content of dilution medium control, solvent control and test medium was determined in the TIC/TOC mode of analysis. Samples injected into the analyser were acidified (phosphoric acid; 0.4 ml of a 5% v/v solution) then purged with nitrogen in order to release inorganic carbon. The oxidant (sodium persulphate; 1.0 ml of a 100 g/l solution) was automatically added to the sample and the mixture heated to approximately 100°C in the analyser to oxidise the organic carbon to carbon dioxide which was quantified.

Appendix 4 Eye Research Centre GLP Compliance Statement 2008



THE DEPARTMENT OF HEALTH OF THE GOVERNMENT OF THE UNITED KINGDOM

GOOD LABORATORY PRACTICE

STATEMENT OF COMPLIANCE
IN ACCORDANCE WITH DIRECTIVE 2004/9/EC

TEST FACILITY

TEST TYPE

Huntingdon Life Sciences Eye Research Centre Occold Eye Suffolk IP23 7PX Analytical Chemistry
Ecosystems
Environmental Fate
Environmental Toxicity
Mutagenicity
Phys/Chem Testing
Toxicology

DATE OF INSPECTION

28th January 2008

A general inspection for compliance with the Principles of Good Laboratory Practice was carried out at the above test facility as part of the UK GLP Compliance Programme.

At the time of inspection no deviations were found of sufficient magnitude to affect the validity of non-clinical studies performed at these facilities.

Dr. Andrew J. Gray

Head, UK GLP Monitoring Authority

MHRA



ALGAL GROWTH INHIBITION ASSAY

HLS study number:

Version ID:

Final

Issue date:

19 August 2008

Sponsor and Test Facility Details

Sponsor

Test Facility

Huntingdon Life Sciences Eye Research Centre Eye Suffolk

IP23 7PX

UK

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Compliance with Good Laboratory Practice

Algal growth inhibition assay

The study described in this report was conducted in compliance with the following Good Laboratory Practice standards and I consider the data generated to be valid.

The UK Good Laboratory Practice Regulations (Statutory Instrument 1999 No. 3106, as amended by Statutory Instrument 2004 No. 994).

OECD Principles of Good Laboratory Practice (as revised in 1997), ENV/MC/CHEM (98) 17.

EC Commission Directive 2004/10/EC of 11 February 2004 (Official Journal No L 50/44).

These principles of Good Laboratory Practice are accepted by the Regulatory Authorities of the United States of America and Japan on the basis of Intergovernmental Agreements.

Jennifer J Wilby BSc MIBiol

Study Director

Huntingdon Life Sciences Ltd

Quality Assurance Statement

Algal growth inhibition assay

The following inspections and audits have been carried out in relation to this study:

Study Phase	Date(s) of Inspection	Date of Reporting to Study Director and Management
Protocol Audit	17 March 2008	17 March 2008
Report Audit	24-25 June 2008	25 June 2008

Process based inspections: At or about the time this study was in progress inspections of procedures employed on this type of study were carried out. These were conducted and reported to appropriate Company Management as indicated below:

Process Based Inspections	Date(s) of Inspection	Date of Reporting to Management
Dose Formulation	3 June 2008	3 June 2008
Experimental Set-up	14 April 2008	14 April 2008
Counting of Cells	30 May 2008	30 May 2008
Sampling of Test Media for	3 June 2008	3 June 2008
Chemical Analysis Carbon Analysis	27 February 2008	27 February 2008

In addition, an inspection of the facility where this study was conducted was carried out on an annual basis. These inspections were promptly reported to Company Management.

SWat 19 Angust 2008

Sarah J Watts CBiol MIBiol MRQA Principal Auditor Department of Quality Assurance, Huntingdon Life Sciences Ltd. Date

Contributing Scientists

Algal growth inhibition assay

Study management

Jennifer J. Wilby BSc MIBiol Study Director (replacement) Aquatic Ecotoxicology and Biodegradation

Kim Utting Cert NatSci (Open)
Study Director (original)
Aquatic Ecotoxicology and Biodegradation

Seamus A Taylor BSc Study Manager Aquatic Ecotoxicology and Biodegradation

Robert A Dickinson BSc Study Manager Aquatic Ecotoxicology and Biodegradation (Carbon Analysis)

Georgina L Podd
Laboratory Technician
Aquatic Ecotoxicology and Biodegradation (Carbon Analysis)

Summary

The effect of (tested as a WAF; water accommodated fraction) on the growth of the unicellular green alga *Pseudokirchneriella subcapitata* was assessed under non-axenic conditions.

The study was conducted in accordance with EC Methods for Determination of Ecotoxicity, Annex to Directive 92/69/EEC (O.J. No. L383A, 1992) Part C, Method 3 "Algal Inhibition Test" and the OECD Guideline for Testing of Chemicals No. 201 "Freshwater Alga and Cyanobacteria, Growth Inhibition Test" (2006).

Six replicate algal cultures, with an initial cell density of 1 x 10⁴/ml, were exposed to a WAF prepared from an aqueous mixture with an initial nominal concentration of 10 g/l. The test media was prepared in OECD medium by the direct addition of the test substance to the dilution medium. To aid dissolution, the test substance was stirred overnight in the dark before being left to stand for approximately 3 hours. The aqueous phase (WAF, approximately 700 ml) was then removed and used as the test medium. The cultures were incubated in an orbital incubator under continuous illumination at temperatures ranging from 22.0 to 24.7°C for 72 hours.

The composition of the test substance made it unsuitable for analysis using chromatographic methods. Consequently, the exposure level was monitored using Total and Dissolved Organic Carbon (TOC and DOC). At the start of the test, the mean measured levels of TOC in samples of the control and test medium were 1.65 and 1.95 mg C/l respectively. The presence of algal cells made it impossible to determine TOC levels in expired test media.

Mean measured DOC levels in control and test medium were 0.55 and 0.05 mg C/l respectively at the start of the test. After 72 hours, the mean measured levels were 2.05 and 0.68 mg C/l respectively. Results of a water extractivity test conducted using a pH 7 buffered solution of at a loading rate of 10 g/l indicated a carbon content of 0.18 mg C/l. The results achieved in the test confirm the low solubility of the test substance.

Cell numbers were counted daily to monitor growth. The test results are expressed in terms of the area under the growth curve and growth rate. Compared to the control culture, neither the area under the growth curve nor the average specific growth rate was significantly reduced at a nominal loading rate of 10 g/l.

The following values were derived from the data:

Area under the growth curve

 E_bL_{50} (72 h) : > 10 g/l* (no inhibition)

Average specific growth rate

 $E_r L_{50} (0 - 72 h)$:> 10 g/l* (no inhibition)

No observed effect loading rate (NOELR): 10 g/l*

*: nominal concentration of the initial aqueous mixture used to prepare the WAF.

1. Introduction

This study was designed to assess the effect of green alga *Pseudokirchneriella subcapitata*.

on the growth of the unicellular green alga *Pseudokirchneriella subcapitata*.

The study was conducted in accordance with EC Methods for Determination of Ecotoxicity, Annex to Directive 92/69/EEC (O.J. No. L383A, 1992) Part C, Method 3 "Algal Inhibition Test" and the OECD Guideline for Testing of Chemicals No. 201 "Freshwater Alga and Cyanobacteria, Growth Inhibition Test" (2006). The design of the study was in accordance with recommendations received from the UK Environment Agency (May 2007), which proposed the use of a WAF.

The protocol was approved by Huntingdon Life Sciences Management and the Study Director on 7 March 2008 and by the Sponsor on 23 January 2008.

The experimental start and completion dates of the study were 24 March and 2 April 2008, respectively.

The study was conducted at Huntingdon Life Sciences Ltd., Eye Research Centre, Eye, Suffolk, IP23 7PX, England.

The composition of the test material made it unsuitable for analysis via chromatographic methods. Consequently, Total and Dissolved Organic Carbon analysis was undertaken on samples of media taken at the start and end of the test.

Information provided by the Sponsor indicated that was insoluble in water. Results of a water extractivity test conducted using a pH 7 buffered solution of SP polymer at a loading rate of 10 g/l indicated a carbon content of 0.18 mg C/l.

In accordance with the recommendation of the OECD Guidance Document on Aquatic Toxicity Testing of Difficult Substances and Mixtures (Number 23), the test results have been expressed in terms of the nominal loading rate (i.e. the nominal weight of the test substance used to prepare the aqueous mixture from which the WAF (water accommodated fraction) was removed).

2. Test substance

Identity:	
Chemical name:	
Lot number:	
Expiry Date:	12 December 2008
Appearance:	White powder
Storage conditions:	Room temperature in the dark, desiccated
Purity/assay:	99.55%
Water solubility:	Insoluble
Sample received (Huntingdon Site):	10 January 2008

The Sponsor's Certificate of analysis is given in Appendix 1

3. Experimental procedure

3.1 Test species

3.1.1 Name

Pseudokirchneriella subcapitata, Strain No. CCAP 278/4.

3.1.2 Source

Axenic, uni-cellular, liquid slope cultures of algae were obtained from the Culture Collection of Algae and Protozoa (CCAP), SAMS Research Services Ltd., Dunstaffnage Marine Laboratory, Dunbeg, Oban, Argyll, Scotland and arrived on 4 March 2008.

3.1.3 Pre-culture

The liquid slope cultures were stored in an illuminated refrigerator. Sterile algal nutrient medium (Appendix 2) was inoculated with cells aseptically removed from the slope culture; these primary liquid cultures (100 ml) were incubated for approximately three days in an orbital incubator under continuous illumination at nominal temperatures in the range 21 to 25°C. Subsequently, appropriate volumes of these primary cultures were aseptically transferred to fresh sterile algal nutrient medium to prepare secondary liquid cultures; these cultures were incubated, as stated above, for a further three days to provide an inoculum in the log phase of growth, characterised by a cell density of 1.44 x 10⁶ cells/ml.

3.2 Culture medium

Sterile algal nutrient medium as recommended in Official Journal No. L383A Part C.3 and OECD Procedure 201 (see Appendix 2).

3.3 Test substance preparation

The method of preparation used during the test was based on recommendations by the UK Environment Agency Chemicals Assessment Unit (May 2007).

The test substance (10 g) was dispersed in culture medium (1 l) in a glass Duran bottle. This aqueous mixture was stirred overnight in the dark before being left to stand for approximately 3 hours. An aliquot (700 ml) of the aqueous phase (WAF) was then removed from mid position from the preparation vessel and was used as the test medium.

An aliquot (4.17 ml) of the secondary algal inoculum was added to a portion (600 ml) of the test medium to give an initial cell density of 1×10^4 cells/ml. An aliquot (100 ml) of the appropriate inoculated test medium was added to each of the test vessels.

3.4 Exposure conditions

3.4.1 Experimental design

The study comprised a definitive (limit) test, which employed a single test concentration, plus an algal nutrient medium control.

Six flasks were established and incubated for the control group and test group. The media remaining in the preparation flasks were used for water quality measurements and carbon analysis at the start.

Before the start of the test, the required number of empty test vessels (250 ml conical flasks), were loosely stoppered with foam bungs, covered with aluminium foil that was secured by autoclave tape and sterilised by autoclaving (121°C for at least 15 minutes). After the addition of the inoculated test medium (100 ml), each flask was then loosely plugged with a foam bung.

The control cultures were prepared as for the test medium except that no test substance was added and a larger volume (700 ml) of medium was made.

3.4.2 Test concentrations

The definitive (limit) test employed a nominal loading rate of 10 g/l. This concentration was based on the nominal weight of test substance used to prepare the aqueous mixture from which the WAF (water accommodated fraction) was prepared.

3.4.3 Stability of test concentrations

Total and Dissolved Organic Carbon (TOC and DOC) analysis (Appendix 3) was undertaken on samples of media taken at the start and, due to the presence of algal cells, analysis for Dissolved Organic Carbon at the end of the test.

At the start of the test, eight samples (50 ml) were taken from the freshly-prepared control media, and four from the test media; after 72 hours, the contents of the replicate flasks for each group were pooled and eight further samples were taken for analysis. All samples were stored in a freezer until defrosted for analysis when required.

Two samples from the start of the test were analysed for Total Organic Carbon and two were filtered (0.45µm cellulose nitrate) before analysis for Dissolved Organic Carbon. At the end of the test, four samples were analysed for Dissolve Organic Carbon.

3.4.4 Environmental conditions

Conical flasks (250 ml) each containing control or test culture (100 ml) were placed in an illuminated orbital incubator according to a random number sequence. The cultures were incubated, without renewal of medium for 72 hours under continuous illumination of approximately 6499 lux provided by 6 x 30 W "cool white" 1 metre fluorescent tubes. The temperature was maintained at 22.0 to 24.7°C (see protocol deviations).

Temperature and pH of control and test flasks at the start and end of the test were recorded. Gaseous exchange and suspension of the algal cells were ensured by the action of the orbital shaker, oscillating at a nominal 150 cycles per minute. The minimum and maximum temperature and light intensity in five positions within the test area (four corner positions and in a central position of the random block design) were determined each day. To minimise the impact of differences in light intensity across the test area on algal growth, control and test flasks were re-positioned in the test area each day during the test.

3.5 Measurement of growth

Samples were taken from control and test flasks at 24, 48 and 72 hours and the cell densities measured using a Coulter Z Series Particle Count and Size Analyser.

The estimate of cell numbers in each sample was based on the mean of three consecutive counts, corrected for background counts of uninoculated dilution media. The presence of any abnormal cells was also noted during screening of each test level.

3.6 Evaluation of data

The data were compiled in an Excel spreadsheet and analysed using SAS 8.2 (SAS Institute 1999) using the nominal loading rate.

The areas under the growth curve were divided by initial counts and total times to give AUCP (Area Under the Curve expressed as a Proportion of the initial cell count), where a value of 1 represents no growth and a value of 0 represents complete toxicity (all algae killed). In order to estimate the loading rate at which 50% inhibition of growth occurred (EL₅₀), sigmoidal curves were fitted to AUCP and growth rate. For both variables, 0% inhibition was defined as the control mean and 100% inhibition was defined as no growth. The minimum of the curve (for infinite concentration) was bounded between 0 and 1 for AUCP and between -1000 and 0 for growth rate.

The formulae for these curves are given below:

$$AUCP = \begin{cases} Con & Control \\ Min + \frac{Con - Min}{1 + \frac{50(Con - 1)ep}{50(Con + 1) - 100Min}} & Otherwise \text{ where } ep = exp\left(s \log\left(\frac{concentration}{EC50}\right)\right) \end{cases}$$

$$Growth \ rate = \begin{cases} Con & Control \\ Min + \frac{Con - Min}{1 + \frac{50Con ep}{50Con - 100Min}} & Otherwise \end{cases}$$

Con = an estimate of the control mean

Min = an estimate of the minimum of the curve

s = slope estimate

The EL_{10} and EL_{50} values could not be calculated because no inhibition of growth was noted.

For AUC and growth rate, the t-test was used to compare the treated group with the control.

3.7 Protocol Deviations

During the test, the temperature of the incubator ranged between 22.0 and 24.7°C, which deviated from the range stated in the protocol (21 to 24°C).

This had no impact on either the integrity or validity of the study as all validity criteria were met.

4. Maintenance of records

All specimens (if appropriate), raw data and study related documents generated during the course of the study at Huntingdon Life Sciences, together with a copy of the final report will be lodged in the Huntingdon Life Sciences Archive.

Specimens and records will be retained for a minimum period of one year from the date of issue of the final report. At the end of the one year retention period the Sponsor will be contacted and advice sought on their future requirements. Under no circumstances will any item be discarded without the Sponsor's knowledge.

Huntingdon Life Sciences will retain the Quality Assurance records relevant to this study and a copy of the final report in its archive indefinitely.

5. Results

5.1 Chemical analysis

The results of the carbon analysis are given in Table 1.

At the start of the test, the mean measured (blank corrected) levels of TOC in samples of the control and test medium were 1.65 and 1.95 mg C/l respectively. The presence of algal cells prevented TOC analysis in expired test media.

Mean measured (blank corrected) DOC levels in control and test medium were 0.55 and 0.05 mg C/l respectively at the start of the test. After 72 hours, the mean measured levels were 2.05 and 0.68 mg C/l respectively.

In accordance with the recommendation of the OECD Guidance Document on Aquatic Toxicity Testing of Difficult Substances and Mixtures (Number 23), the test results have been expressed in terms of the nominal loading rate (i.e. the nominal weight of the test substance used to prepare the aqueous mixture from which the WAF (water accommodated fraction) was removed).

5.2 Algal growth

Cell numbers were counted daily to monitor growth. The test results are expressed in terms of the area under the growth curve and growth rate.

Compared to the control cultures, neither the area under the growth curve nor the average specific growth rate was significantly reduced at a nominal loading rate of 10 g/l. Based on these findings, the following values were derived from the data:

Area under the growth curve E_bL_{50} (72 h) :> 10 g/l* (no inhibition)

Average specific growth rate $E_{\tau}L_{50}$ (0 - 72 h) :> 10 g/l* (no inhibition)

No observed effect loading rate (NOELR) : 10 g/l*

The mean coefficient of variation (CoV) for daily growth rates in control cultures ranged between 3.36 and 4.27 during the test and the CoV for the average specific growth rates of control cultures was 1.17 during the 72 hour exposure period.

^{*:} nominal concentration of the initial aqueous mixture used to prepare the WAF.

5.2.1 Observations

No microscopic abnormalities of the cells were detected.

5.2.2 Environmental parameters

The measurements of water quality (temperature and pH) in control and test flasks are summarised in Table 4; they remained within acceptable limits throughout the study.

The temperature of the incubator ranged between 22.0 and 24.7°C (see protocol deviation). Measurement of light intensity ranged between 6424 and 6584 lux (mean values) during the test and were within the range -5.4 and +7.7% (Table 4).

At the start of the test, the test medium was colourless.

6. Conclusions

Under the conditions of the study, was not found to be acutely toxic to *Pseudokirchneriella subcapitata* when tested as a WAF at a nominal loading rate of 10 g/l.

Consequently, the 72-hour E_bL_{50} and E_rL_{50} values for could not be calculated but must be >10 g/l and the "no observed effect loading rate" was 10 g/l.

7. References

OECD Guidance Document on Aquatic Toxicity Testing of Difficult Substances and Mixtures (Number 23) ENV/JM/MONO(2000)6

SAS INSTITUTE (1999) SAS OnlineDoc® Version Eight. SAS Institute Inc., Cary, NC, USA.

UK ENVIRONMENT AGENCY CHEMICALS ASSESSMENT UNIT RECOMMENDATIONS (2007). Notification of New Substances Regs. (1993): Level 1B Testing Proposal

Table 1 Measured TOC and DOC concentrations

Nominal	Measured TOC concentrations (mg C/l)	
Loading Rate (g/l)	0 h	ours
Control	0.3	3.0
Control	(1.	65)
. 10*	2.25	1.65
10*	(1.	95)

* : blank corrected values (measured concentration - mean control value for sampling occasion)
 () : mean measured concentration

Nomina	Measured DOC concentrations (mg C/l)			
Loading Rate (g/l)	0 ho	urs	72 t	nours
	0.5	0.6	2.0	2.2
Control	(0.5	55)		
Control	-	-	2.1	1.9
	-		(2.	.05)
	0.05	0.05	2.65	0.05
10*	(0.0))5)		
10	-	-	0.0	0.0
	-		(0	.68)

* : blank corrected values (measured concentration - mean control value for sampling occasion)
 () : mean measured concentration

Table 2 Cell densities

Nominal Loading	Replicate	Cell densities (x 10 ⁴ cells/ml)			
Rate (g/l)	number 24 hours	48 hours	72 hours		
Control	R_1	46317	265750	1189017	
	R ₂	50450	265283	1320450	
	R ₃	51550	256283	1264583	
	R_4	48383	226017	1123150	
	R ₅	43583	234750	1239817	
	R_6	48450	256650	1262417	
	Mean	48122	250789	1233239	
10	R_1	53683	245517	1073850	
	R ₂	55983	258350	1139250	
	R_3	54517	238983	1212517	
	R ₄	57017	239117	1229550	
	R ₅	58383	265850	1254450	
	R ₆	55317	251117	1227550	
	Mean	55817	249822	1189528	

 $R_1.R_6$: replicate number.

Note : the initial cell density was estimated to be 1.03×10^4 /ml.

Table 3 Inhibition of growth

Parameter	Nominal Loading Rate	Sample size	Mean	% Inhibition	p
Area under curve to 72	Control	6	21.4	0.0	-
hours	10 g/l	6	21.0	1.7	0.560
C th t- 72 h	Control	6	0.066	0.0	-
Growth rate to 72 hours	10 g/l	6	0.066	0.8	0.304
Growth Rate	Control	6	0.065	0.0	-
0 - 24 hours	10 g/l	6	0.071	-9.5	<0.001***
Growth Rate	Control	6	0.068	0.0	
24 - 48 hours	10 g/l	6	0.062	9.2	<0.001***
Growth Rate	Control	6	0.066	0.0	-
48 – 72 hours	10 g/l	6	0.065	2.1	0.370

p values are for the comparison with Control using the t-test *** p < 0.001

Table 4 Environmental parameters

a) Temperature and pH

Nominal Loading Rate	Temperature °C		рН	
(g/l)	0 h	72 h	0 h	72 h
Control	22.4	22.1	7.61	8.27
10	22.3	22.1	7.69	8.36

b) Light intensity

		Exposu	re (days)	
Incubator	0	1	2	3
Position		I	лх	
Top/left	6840	6370	6460	6430
Bottom/left	6430	6330	6420	6430
Centre	6970	6920	6990	6780
Top/right	6230	6240	6310	6440
Bottom/right	6450	6260	6370	6310
mean	6584	6424	6510	6478
% variation	-5.4 / +5.9	-2.9 / +7.7	-3.1 / +7.4	-2.6 / +4.7

Appendix 1 Certificate of Analysis

CERTIFICATE OF ANALYSIS

NAME OF SAMPLE		
LOT NO, OF SAMPLE :		
DATE OF ANALYSIS : 12 December	er 2008	
COMPARITION		
COMPOSITION Identity	Cas No.	Conc.
<i>i</i> :4		υ _{/6} ,
#5		n _o

NAME

TOTAL

SIGNATURE

DATE 23 June 2008

100%

Appendix 2 Algal Nutrient Medium (OECD)

Four stock solutions were prepared according to the following table, using filtered, dechlorinated tap water which had been softened and treated by reverse osmosis, before microfiltration and purification (resistivity of 18 Megohm/cm). Stock solutions were sterilised by autoclaving (solutions 1-3) or by membrane filtration (solution 4) before being stored at 4°C in the dark.

Aliquots of stock solutions 1-3 were further diluted with the same diluent and autoclaved again to produce the working strength nutrient medium. Stock solution 4 was added to the medium on the day of use. The pH of the medium after equilibration with air is approximately 8.

Nutrient	Concentration in stock solution (g/l)	Volume of stock solution per litre of final medium (ml)	Final concentration in test solution (mg/l)
Stock solution 1: macro-nutrients			
NH ₄ Cl MgCl ₂ .6H ₂ O CaCl ₂ .2H ₂ O MgSO ₄ .7H ₂ O KH ₂ PO ₄	1.5 1.2 1.8 1.5 0.16	10	15 12 18 15 1.6
Stock solution 2: Fe-EDTA			
FeCl ₃ .6H ₂ O Na ₂ EDTA.2H ₂ O	0.064 0.1	1	0.064 0.1
Stock solution 3: trace elements			
H ₃ BO ₃ MnCl ₂ .4H ₂ O ZnCl ₂ CoCl ₂ .6H ₂ O CuCl ₂ .2H ₂ O Na ₂ MoO ₄ .2H ₂ O	0.185 0.415 3 x 10 ⁻³ 1.5 x 10 ⁻³ 10 ⁻⁵ 7 x 10 ⁻³	1	0.185 0.415 3 x 10 ⁻³ 1.5 x 10 ⁻³ 10 ⁻⁵ 7 x 10 ⁻³
Stock solution 4: NaHCO ₃			
NaHCO ₃	50	1	50

Appendix 3 Total and Dissolved Organic Carbon Analysis (TOC and DOC)

Introduction

TOC or DOC concentrations in aqueous mixtures were determined using an OI Model 700 carbon analyser. Samples for DOC analysis were prepared by filtration of the medium (0.45 µm membrane filters).

Organic carbon concentrations were measured in this analysis by the amount of carbon dioxide released by chemical oxidation of the aqueous sample at 100°C in the presence of phosphoric acid and sodium persulphate. The carbon dioxide was purged from the sample, concentrated by trapping and desorbed and carried to a non-dispersive infrared detector (NDIR) whose output was calibrated (using aqueous solutions of potassium hydrogen phthalate) to directly display the concentration of carbon present in the sample. Sample volumes were measured using a calibrated sample loop (1.02 ml) and phosphoric acid then sodium persulphate were automatically injected with each sample.

Materials

Chemicals used in carbon analysis

Potassium hydrogen phthalate (Analar grade) used as a standard.

Sodium persulphate (98+%).

Phosphoric acid (85% Orthophosphoric acid, analytical grade; SG 1.7) for acidification of samples as part of the analysis in "TIC/TOC" mode.

Dilution water

The dilution water used to prepare solutions was tap water that had been softened and treated by reverse osmosis then purified; resistivity ≥ 18 M Ω .cm. This water complied with the relevant British Standard and American Society for Testing and Materials for classification as Grade 1 or Type 1 Laboratory Water, respectively.

Determination of carbon levels

The carbon analyser was calibrated using at least five samples of an aqueous solution of potassium hydrogen phthalate (20 mg C/l). At least five samples of ultrapure water verified the absence of contamination within the carbon analyser and the TOC content of five samples of the reagents (sodium persulphate and phosphoric acid) were analysed to obtain a mean blank value in the calibration. These reagent blanks were entered into the calculation program of the analyser. The potassium hydrogen phthalate solution was analysed at the end of each set of analyses and verified the stability of the detector response.

The TOC/DOC content of dilution medium control, solvent control and test medium was determined in the TIC/TOC mode of analysis. Samples injected into the analyser were acidified (phosphoric acid; 0.4 ml of a 5% v/v solution) then purged with nitrogen in order to release inorganic carbon. The oxidant (sodium persulphate; 1.0 ml of a 100 g/l solution) was automatically added to the sample and the mixture heated to approximately 100°C in the analyser to oxidise the organic carbon to carbon dioxide which was quantified.

Appendix 4 Eye Research Centre GLP Compliance Statement 2008



THE DEPARTMENT OF HEALTH OF THE GOVERNMENT OF THE UNITED KINGDOM

GOOD LABORATORY PRACTICE

STATEMENT OF COMPLIANCE IN ACCORDANCE WITH DIRECTIVE 2004/9/EC

TEST FACILITY

TEST TYPE

Huntingdon Life Sciences Eye Research Centre Occold Eye Suffolk IP23 7PX Analytical Chemistry Ecosystems Environmental Fate Environmental Toxicity Mutagenicity Phys/Chem Testing Toxicology

DATE OF INSPECTION

28th January 2008

A general inspection for compliance with the Principles of Good Laboratory Practice was carried out at the above test facility as part of the UK GLP Compliance Programme.

At the time of inspection no deviations were found of sufficient magnitude to affect the validity of non-clinical studies performed at these facilities.

Dr. Andrew J. Gray
Head, UK GLP Monitoring Authority

MHRA